

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD

GLOBAL CONTACT SERVICES, INC.,
Employer,

and

LOCAL 621 UNITED CONSTRUCTION
TRADES & INDUSTRIAL EMPLOYEES
Petitioner

and

TRANSPORT WORKERS UNION
LOCAL 100, AFL-CIO
Intervenor

and

LOCAL 322, UNITED WORKERS OF
AMERICA
Intervenor.

Case No. 29-RC-134071

EMPLOYER'S EXCEPTION TO THE REPORT ON OBJECTIONS

Pursuant to Rule 102.69 of the Board's Rules and Regulations, Global Contact Services, Inc. ("GCS"), Employer in the above-captioned case, files the following Exceptions to the Report on Objections issued by the Regional Director of Region 29 on October 22, 2014 (the "Report").¹

1. GCS excepts to the Regional Director's decision to overrule the objection that Local 621 ("Local 621") United Construction Trades & Industrial Employees "offered to pay cash to an employee for his support in the campaign" on the basis that GCS did not file an objection "specifically alleging" that conduct. (Report, p. 14.)

¹ An objections hearing was held on November 4, 2014 on GCS's objections 1(a) and (b) of the Employer's Objections to Union Conduct Affecting the Results of the Election. When the Hearing Officer's report on objections issues, GCS reserves the right to file exceptions, if necessary, to that report.

As explained more fully in GCS's brief in support of the instant exception, the Regional Director's finding fails to take into consideration that the above objection (which is supported by an employee's sworn statement attached to GCS's position statement in support of objections), closely relates to GCS's timely filed objections that Local 621 engaged in conduct that destroyed the laboratory conditions necessary for a free and fair election by providing employees with substantial benefits.

WHEREFORE, for the reasons explained above and more completely in GCS's supporting brief, GCS respectfully requests that the Board set aside the election and direct a re-run election in Case No. 29-RC-134071 based upon the objectionable conduct of the Local 621 and Local 100. In the alternative, GCS asks that the Board direct the Regional Director to schedule a hearing on GCS's objection relating to Local 621 so that GCS has an adequate opportunity to develop the factual record in support of its Objection.

Dated this the 5th day of November 2014.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

By:



Christopher R. Coxson
Counsel for Global Contact Services, Inc.

CERTIFICATE OF SERVICE

This is to certify that I have this day served via electronic filing these Exceptions on:

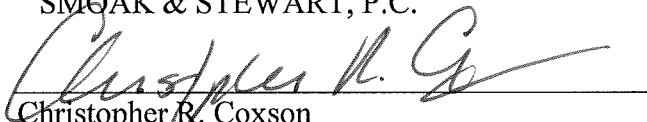
James G. Paulsen, Regional Director
National Labor Relations Board – Region 29
Two Metro Tech Center, Suite 5100
Brooklyn, NY 11201

This is to certify that I have this day served via electronic mail these Exceptions on:

Stephen Goldblatt, Esq. 3315 Nostrandt Avenue Ste L1-A Brooklyn, NY 11229-3269	Kenneth Page, Director, Legal Department 1700 Broadway 21 st Floor, Suite 2101 Brooklyn, NY 11201
Stephen G. Sombrotto, Representative United Workers of America Local 322 367 Long Beach Rd., No. 147 Island Park, NY 11558-4010	

This the 5th day of November 2014.

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.



Christopher R. Coxson
Counsel for Global Contact Services, Inc.